

ORIGINAL

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FILED IN THE
 UNITED STATES DISTRICT COURT
 DISTRICT OF HAWAII

MAY 19 2006

at 3 o'clock and 5 min. P.M.
 SUE BEITIA, CLERK

Attorney for Defendant
CHERYL ZEMBIK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

WILLIAM KOTIS,

Plaintiff,

vs.

STATE OF HAWAII DEPT. OF
 PUBLIC SAFETY, et. al.

Defendants.

CIVIL NO. 04-00167 SOM-KSC
 (Consolidated)

DEFENDANT CHERYL ZEMBIK'S
 COMPREHENSIVE WITNESS LIST

Trial Date: June 20, 2006

DEFENDANT CHERYL ZEMBIK'S COMPREHENSIVE WITNESS LIST

COME NOW DEFENDANT CHERYL ZEMBIK, by and through her attorneys, Mark J. Bennett, Attorney General of Hawaii, and Caron M. Inagaki and John M. Gregor, Jr., Deputy Attorneys General, hereby submits her comprehensive

witness list.

WITNESSES TO BE CALLED

A. LAY WITNESSES

1. Cinda Sandin
Residency Section Supervisor of Halawa Correctional Facility
c/o John M. Gregor, Esq.
Dept. of the Attorney General
425 Queen Street
Honolulu, Hawaii 96813

State employee to testify on matters related to liability, including policies and procedures and her conversations with the Plaintiff.

2. Gary Kaplan
Administrator with Halawa Correctional Facility
c/o John M. Gregor, Esq.
Dept. of the Attorney General
425 Queen Street
Honolulu, Hawaii 96813

State employee to testify as to authenticity of documents and to policies and procedures.

3. Cheryl Zembik
Social Worker IV
c/o John M. Gregor, Esq.
Dept. of the Attorney General
425 Queen Street
Honolulu, Hawaii 96813

Defendant, State employee to testify on matters related to liability including policies and procedures and her conversations, if any, with Plaintiff.

4. Edward Rogish
Adult Corrections Officer IV

c/o John M. Gregor, Esq.
Dept. of the Attorney General
425 Queen Street
Honolulu, Hawaii 96813

State employee to testify on matters related to liability
regarding Plaintiff's claims of a secret meeting.

5. Gary Saldana, M.D.
c/o Department of Public Safety
State of Hawaii
919 Ala Moana Boulevard, 4th Floor
Honolulu, Hawaii 96814

Dr. Saldana is expected to testify regarding Plaintiff's
allegations and other related matters relating to his medical
records and medical care.

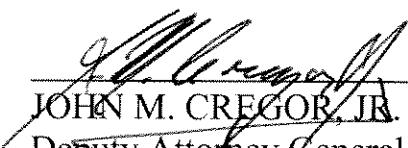
6. Kay Bauman, M.D.
c/o Department of Public Safety
State of Hawaii
919 Ala Moana Boulevard, 4th Floor
Honolulu, Hawaii 96814

Dr. Bauman is expected to testify regarding Plaintiff's
allegations and other related matters relating to his medical
records and medical care.

B. EXPERT WITNESSES

Defendant does not anticipate calling any expert witnesses.

DATED: Honolulu, Hawai'i, May 19, 2006.


JOHN M. CREGOR, JR.
Deputy Attorney General
Attorney for Defendant
CHERYL ZEMBIK

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII**

WILLIAM KOTIS,

Plaintiff,

vs.

STATE OF HAWAII DEPT. OF
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CERTIFICATE OF SERVICE

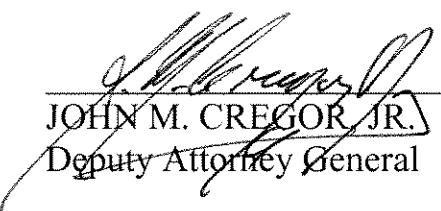
CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 19, 2996, a copy of the foregoing document was served on the following at her last known address via U.S. mail, postage prepaid as follows:

William Kotis #A0182281
CCA/Tallahatchie Correctional Center
295 US Highway 49 South
P. O. Box 388
Tutwiler, MS 38963

Plaintiff Pro Se

DATED: Honolulu, Hawaii, May 19, 2006.


JOHN M. GREGOR, JR.
Deputy Attorney General

Attorney for Defendant
CHERYL ZEMBIK